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**via ECF**

The Honorable Zahid N. Quraishi  
The Honorable Tonianne J. Bongiovanni  
United States District Court for the District of New Jersey  
Clark S. Fisher Building  
402 East State Street  
Trenton, New Jersey 08608

March 13, 2024

**RE: Kim et. al. v. Hanlon et. al**  
**Civil Action No. 24-1098(ZNQ)(TJB)**

Dear Judges Quraishi and Bongiovanni,

I represent Defendant Burlington County Clerk in the above referenced matter. Please accept this letter in support and furtherance of Rajiv D. Parikh's request for a discovery dispute conference in the above referenced matter.

As this court noted in our initial conference, due to the time constraints imposed by the date of the filing and the schedule of the elections, Defendants are forced to rely on cross-examination of Plaintiffs' experts, as it is not practical to procure their own experts in such a short window. Not content that their strategic delay in filing is causing Defendants to fight with one arm behind their back, Plaintiffs are also attempting to blindfold their opponents by refusing to turn over a limited number of highly relevant documents. Without these documents, Defendants will be prejudiced in key parts of their defense.

While expedited written discovery was not addressed at the initial conference, it is illogical and unjust that Defendants would be completely reliant on cross-examination without having access to the basic and limited discoverable information. Plaintiffs' opposition to these requests has no basis in lack of relevance or privilege, and their only remaining objection is that discovery was not contemplated here. In doing so, Plaintiffs are essentially admitting that their eleventh-hour application is designed to force the court to decide an issue of statewide importance on a limited record that prejudices the Defendants.

Respectfully Submitted,

/s/ Mark R. Natale, Esq.

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